

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**JAMES MICHAEL AMOR  
PATRICIA ELVIRA AMOR,**  
213 N. Kinzer Ave.  
New Holland, PA  
17557

*Plaintiffs,*

**vs.**

**COURTNEY CONOVER**  
10631 Randleman Rd. #7  
Randleman, NC 27317

*Defendant.*

NO. 21-5574

CIVIL ACTION

JURY TRIAL DEMANDED

**MOTION FOR TEMPORARY RESTRAINING ORDER**

By and through their undersigned counsel, the Plaintiffs hereby move the Court for a Temporary Restraining Order against the Defendant for the reasons set forth herein and in the attached Memorandum of Law. Plaintiffs incorporate their prior Motion and Memorandum for Preliminary Injunctive Relief filed December 30, 2021.

1. The Plaintiff, JAMES MICHAEL AMOR, is a Doctor of Medical Dentistry with a business practice located at 566 E. Main Street, New Holland, PA 17557.
2. The co- Plaintiff, PATRICIA ELVIRA AMOR, is the wife of JAMES MICHAEL AMOR.
3. The Defendant, COURTNEY CONOVER, is an adult individual located at 10631 Randleman Rd. #7 Randleman, NC 27317.

4. Dr. Amor provides professional dental services to the public.

5. Dr. Amor was also employed as the Performance Entertainment Director of the Pittsburgh Renaissance Faire (Faire ) in the Summers of 2020 and 2021.

6. Dr. Amor expects to be employed as the Performance Director of the Pittsburgh Renaissance Faire (Faire ) in the Summers of 2022.

7. He has had this position since 2009.

8. Dr. Amor expects to be employed as the Director of other Faires around the United States.

9. The Defendant was a paying guest in 2020 and 2021.

10. Plaintiffs requested preliminary relief against Defendant for the continual defamatory allegations of Defendant, who accused Doctor Amor and his wife of aiding and abetting pedophiles and/or rapists by refusing to take the claims of allegation rape and sexual assault victims seriously and by retaliating against them.

11. Since that filing, Defendant has continued to defame the Plaintiffs by more subtle means.

12. Defendant has refused to make herself available for a deposition by representing that she has a severe illness.

13. Defendant has provided no probative document, either to Plaintiffs or to the Court, reflecting, referencing, or relating to said illness.

14. On the contrary, instead of being bedridden, Defendant found the time, to spend at least 2 hours dining out at the Texas Roadhouse for her son's birthday. See Exhibit 1.

15. Further, the pictures posted by Defendant on that day do not indicate that she was sick.

16. Defendant's allegations against the Plaintiffs are false.

17. Plaintiffs have sworn in affidavits, hereto attached and incorporated herein as Exhibit 2, that Defendant's allegations are false.

18. Plaintiffs have sworn in the same affidavit, the likelihood of irreparable harm if the Defendant is not stopped from continuing to defame them.

19. On March 21, 2022, this Court postponed the Preliminary Injunction hearing to April 26, 2022, at 10:00 AM. (ECF ¶22).

20. Defendant continues to defame the Plaintiffs and does so with stealth.

21. As of March 30, 2022, Defendant posted a link to her blog in which Plaintiffs are defamed.

22. The contents of this blog are attached as Exhibit 1, filed under seal because of the defamatory content.

23. Plaintiffs request a TRO to preserve the status quo until the Preliminary Injunction hearing.

24. The reasons for this request include, but are not limited to, Defendant's renewed assertions that her defamatory allegations are accurate and that the Plaintiffs' suit against her is evidence of this accuracy.

25. Defendant, however, has admitted that she has no direct knowledge of any of the defamatory allegations she has leveled against the Plaintiffs.

26. In short, there is no admissible evidence supporting her position. All of her information is hearsay.

27. Plaintiffs have admissible evidence in the form of their affidavits swearing and attesting that Defendant's allegations of aiding and abetting pedophiles and/or rapists by refusing to

take the claims of rape and sexual assault victims seriously are blatantly false, as are all Defendant's defamatory allegations including Plaintiffs retaliating against rape and sexual assault victims.

28. The Plaintiffs have been damaged by and will continue to be irreparably damaged by the Defendant's unrepentant, defamatory and obstreperous conduct.

29. Plaintiffs request a TRO because damages alone are insufficient to remedy Defendant's conduct described above.

30. Defendant has not indicated she will stop. In fact, to the contrary. Her correspondence to her followers promises to republish the defamatory statements once she gets better.

31. Defendant did not wait to republish the defamatory statements, as indicated infra.

32. Absent immediate equitable relief, damages will continue.

33. If Defendant is permitted to continue her wrongful conduct as aforesaid, the Plaintiffs will suffer irreparable harm as follows:

(a) Plaintiff Amor will lose and continue to lose a substantial number of current and prospective patients; and

(b) Plaintiff Amor will suffer and continue to suffer a substantial loss of business and profits now and in the future.

(c) Plaintiff Amor will be terminated as Director for numerous Faires, resulting in a loss of income and irreparable harm to his and his wife's reputation.

If the Defendant is to be given the benefit of a delay of almost a month until the Preliminary Injunction Hearing, Plaintiffs should be given the security that Defendant will cease and desist from all defamatory conduct until that time.

WHEREFORE, for the foregoing reasons, the Plaintiffs request that the Court enter the attached Order Granting Injunctive Relief against the Defendant granting all such relief as the Court deems necessary.

Respectfully submitted,

KOLMAN LAW P.C.

BY: *Timothy M. Kolman*

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April 4, 2022